

S/N 09/928,028

Attorney Docket No. SYN006-04

**REMARKS**

Claims 1-57 are pending in this application and have been rejected by the Examiner.

1. **§ 101 Statutory Subject Matter Rejection of Claims 1, 12 and 48**

Claim 1 has been amended in accordance with the Examiner's suggestion in a phone interview on March 7, 2006. In the same interview the Examiner indicated that he was withdrawing his § 101 rejection of claims 12 and 48.

2. **103(a) Rejection over US 6,065,039 in view of US 6,473,794**

The Examiner has rejected all of the claims in the application as being obvious in view of U.S. Patent No. 6,065,039 to Paciorek in view of U.S. Patent 6,473,794 to Guheen et al. Applicant respectfully disagrees with the Examiner's position. To the extent that the present invention is based upon broadly known concepts in distributed computing fields some aspects of it are disclosed in the cited references. However, as described in more detail with reference to each claim below, the invention includes novel aspects not disclosed by the cited references, alone or in combination, or known in the prior art.

a. **Office Action - Paragraph 1 (page 3) - Rejection of Claims 1, 5 and 12**

It will be helpful in analyzing Paciorek to compare terms used in the present application and Paciorek. As used in Paciorek the term "agent" is the same as a "service" in the application. Paciorek also has an "agent group" which appears to be the equivalent of a "group" in the application. Each "agent" also may also have an "agent proxy" (also referred to in Paciorek as an "agent group proxy") that handles communication for the "agent group". This "agent proxy" is somewhat analogous, although not the same as, the "grouping agent" described in the

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application. Importantly with respect to claims 1, 5, and 12, Paciorek does not disclose that the “agent proxy” is comprised of any subcomponents. However, claims 1, 5 and 12 clearly set out a “group proxy” comprised of two subcomponents: a “group shell” and a “service proxy”. Further, the “group proxy” in the present invention is used to allow clients to call groups of services, whereas the “agent proxy” is allows group members (i.e. services) to communicate with each other or some base computer. A group proxy is described in detail in the present application on page 15, line 16 through page 17, line 17 with reference to Figure 2. The Applicant believes that neither Paciorek or Guheen describe, disclose or suggest a proxy that is at all similar in composition or function to Applicant’s group proxy.

Pacioerek therefore does not event disclose the concept of a group proxy as described in the present invention. Likewise Guheen does not disclose a group proxy (i.e. a proxy allowing client to call a group of services). Applicant concedes that proxies have existed and discuss them in the description of prior art (see Figure 1). The Examiner appears to treat any reference to a proxy in the cited references as the equivalent of a group proxy. Applicant respectfully urges that this is not accurate.

Applicant therefore respectfully submits that claims 1, 5 and 12 and their dependent claims are allowable.

**b. Office Action - Paragraph 1 (page 3) – Rejection of Claims 19, 34, 43 and 48**

As argued in paragraph a above, claims 19, 34, 43 and 48 claim a group proxy, which is not taught or suggest by Paciorek or Guheen teach, along or in combination. In addition, these claims further include a “group service” which creates and maintains the group proxies.

Applicants could find no reference to a “group service,” or its equivalent, in the sections of

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Paciorek cited by the Examiner. Paciorek does teach a "software applicaton" that generates the agents and the agent groups, and further that the agents create group agent proxies (column 5, lines 13-17), but this "software application" is not further described at all and does not appear to perform the functions described for Applicant's "group service" (creating, maintaining and registering groups and group proxies). Importantly, Paciorek clearly states that, "the function of the proxy is to maintain an active connection to the associated agent group". Thus, this proxy allows group members to work within the group, whereas the group proxy of Applicant's invention allows clients outside the group to call the group.

Applicant therefore respectfully submits that claims 19, 34, 43 and 48 and their dependent claims are allowable.

c. Office Action - Paragraph 1 (page 3) – Rejection of Claim 53

In addition to the arguments made above with respect to the group proxy, Claim 53 claims a group proxy that is able to buffer commands. No reference to buffering commands can be found in the Examiner's rejection of this claim or the cited references. Buffering is storing of commands from a client to a group of services while the group is unavailable and then forwarding those commands to the group when it becomes available. Applicant is unable to find the concept of command buffering in the cited sections of Edwards. Paciorek does disclose that the agent group may store results from the agents until all agents arrive at the collaboration point (column 3, lines 42-44), however this is not the same function, nor does it achieve the same result as the buffering of commands.

Applicant therefore respectfully submits that claim 53 and its dependent claims are allowable.

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- d. Office Action - Paragraph 2 (page 4) – Rejection of Claims 2, 8, 9, 10, 15, 16, 17, 32 and 41

Applicant repeats the portions of Guheen cited by the Examiner below (col 228, lines 25-35):

1. CLS Uses Multiple, Linked Computers. In CLS, users interact with micro-computers, such as the well-known, highly advanced, and inexpensive Personal Computer (PC). The micro-computers are located at locations of the users' preference, such as their homes, offices, or vehicles. The micro-computers connect with CLS by data links, such as private or public data networks, or by commercially available telephone channels.

The links can take the form of traditional, hard-wired telephone channels, or wireless links, such as provided by cellular telephone service.

Applicant respectfully submits that Guheen does not teach the formation of a proxy while the application is executing, and that claims 2, 8, 9, 10, 15, 16, 17, 32 and 41 are therefore allowable.

- e. Office Action - Paragraph 4 (page 4) – Rejection of Claims 4, 11, 18, 33, 42, 47, 52, and 56

The Examiner has rejected these claims on the basis that Paciorek discloses command buffering. Applicant has addressed command buffering in paragraph c above and respectfully submits that it is not taught or suggested by Paciorek or Guheen and that claims 4, 11, 18, 33, 42, 47, 52, and 56 should therefore be allowed.

- f. Office Action - Paragraph 3 (page 4) – Rejection of Claim 3

The Examiner cites the same portion of Guheen (col 228, lines 25-35) as presented in paragraph d above as disclosing the modification of a group proxy while an application is

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executing. Applicant respectfully submits that Guheen does not teach such a modification, and that claim 3 is therefore allowable.

g. Office Action - Paragraph 5 (page 4) – Rejection of Claims 6 and 13

Examiner assert that Paciorek and Guheen teach the selection of a group logic shell based on the desired group structure. No discussion of group logic shells, groups, or group structure or their equivalent could be found in the section of Guheen cited by the Examiner. As argued in paragraph a above, neither Paciorek or Guheen disclose a group logic shell. Therefore it would be impossible for them to teach selection of a group logic shell based on the group structure. Neither Guheen or Paciorek even suggest the use of multiple group structures. As explained in the present application, groups may be peer or coordinator cohort in structure. Neither Paciorek or Guheen discuss such structures, or any others. In order for a group to operate correctly, the group proxy must accommodate such structure and this is done through the appropriate selection of a group logic shell (which forms part of the group proxy). Pages 20-26 and figures 3-6 of the application describe operation in a coordinator cohort group and pages 26-29 and figures 7-9 describe operation in a peer group.

Applicant respectfully submits that claims 6 and 13 are therefore allowable.

h. Office Action - Paragraph 6 (page 5) – Rejection of Claims 7, 14, 20, 35, 44 & 49

Applicant repeat the arguments made in paragraph g above. Applicant further points out that neither Paciorek or Guheen discuss peer-to-peer or coordinator cohort groups at all.

Applicant respectfully submits that claims 7, 14, 20, 34, 44 & 49 are allowable.

Remaining Dependent Claims

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Applicant has already addressed each of the independent claims and many of the dependent claims above. Since all of the independent claims are allowable, as argued above, Applicant submits that the remaining dependent claims not specifically addressed herein are allowable based upon the arguments set forth with respect to both the independent claims and dependent claims specifically addressed.

Applicant respectfully submits that all the remaining dependent claims are allowable in their present form.

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Fundamentally, Applicant submits that the prior art cited by the Examiner does not disclose groups as used by Applicant (although such use of groups is known and discussed in the prior art section of the present application). Furthermore, they do not disclose a group proxy (a special proxy allowing a client to call a group of services) comprised of a group logic shell (containing logic for operation with a group) and a service proxy (containing logic to communicate with a member service of a group). In prior art embodiments, a client would merely call a service proxy for and individual member of a group (as shown in Figure 1). One of the benefits of the current embodiment is that the group proxy makes a plurality of services look to the client as if it is a single service.

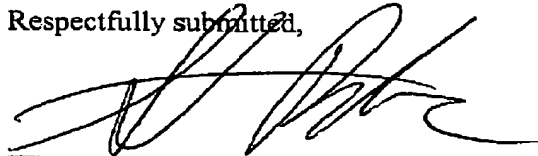
It is respectfully submitted that all claims in the application are allowable. Reconsideration and withdrawal of all rejections are respectfully requested. Favorable notice to this effect and early Notice of Allowance are earnestly solicited.

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Should the examiner have any questions and in order to expedite prosecution of this Application, the Examiner is encouraged to contact the undersigned directly.

Respectfully submitted,



Date: March 8, 2006

Stuart D. Rudoler, Reg. No. 45,059  
Attorney for Applicant  
Stuart Rudoler LLC  
2 Bala Plaza, Suite 300  
Bala Cynwyd, PA 19004  
Tel: 610-660-7753; Fax: 267-200-0796